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August 15, 2022

RE: Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.,
No. 17-cv-6221 (KPF) (SLC)

Dear Judge Failla:

Defendants respectfully request leave to file under interim seal their Objections to Magistrate Judge Sarah L. Cave's Report and Recommendation, and to file a motion to seal along with proposed redacted and highlighted copies by September 12, 2021.

Your Honor previously ordered the parties to follow this procedure for the sealing and redaction of previous briefing relating to Plaintiffs' class certification motion. (ECF No. 408 at 2.) Defendants' filing of a sur-reply (ECF 494, 497) and Plaintiffs' filing of their sur-sur-reply (ECF 511, 512) were also made in accordance with this procedure. Defendants respectfully submit that the same procedure should apply to Defendants' Objections, which contains references to materials designated as Highly Confidential or Confidential pursuant to the Protective Order in this case. (ECF 150.)

Respectfully,

/s/ Michael A. Paskin

Michael A. Paskin

*Attorney for Defendants Morgan Stanley &
Co. LLC, Prime Dealer Services Corp., and
Strategic Investments I, Inc.*

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VIA ECF